1	A During that period, yes, sir.
2	Q Okay. Now do you recall going to the
3	household of William and Joanne Gray?
4	A Yes.
5	JUDGE STIRMER: Before we leave that, Mrs.
6	Stewart.
7	THE WITNESS: Yes.
8	JUDGE STIRMER: Did you personally visit
9	Mrs. Wynn's home?
10	THE WITNESS: Yes.
11	JUDGE STIRMER: And this notation on page 19
12	of Exhibit 21 indicates that KOKS personnel visited the
13	home in January and did not see any evidence of any
14	blanketing or other interference on any channel. Is
15	that correct?
16	THE WITNESS: On any channel? It should have
17	been on any channel except Channel 6. The word
18	"except" should have been put in there.
19	JUDGE STIRMER: The word "except" Channel 6?
20	THE WITNESS: Yes, sir.
21	JUDGE STIRMER: Now you say in the next
22	sentence, or it is stated in the next sentence, "A
23	filter was installed on Mrs. Wynn's set in January and
24	improved reception on all channels except Channel 6"?
25	THE WITNESS: Yes.

1	JUDGE STIRMER: Now if there was good
2	reception and there was no evidence of blanketing or
3	any other interference, why was a filter installed?
4	THE WITNESS: There was a lot of junk
5	floating around out there, sir, and a filter will take
6	out any kind of stuff. And you will see improvement on
7	channels when you install a filter just simply because
8	it does take out stuff that is in the air.
9	JUDGE STIRMER: Now you say, it is stated
10	that Mrs. Wynn was dissatisfied with this result. Why
11	was she dissatisfied?
12	THE WITNESS: Because Channel 6 did not come
13	in.
14	JUDGE STIRMER: And it is your testimony that
15	she was able to receive Channels 8, 12 and 15 without
16	any blanketing interference?
17	THE WITNESS: Yes, sir.
18	JUDGE STIRMER: From KOKS?
19	THE WITNESS: Yes, sir.
20	JUDGE STIRMER: All right.
21	BY MR. SHOOK:
22	Q Now when you went to Mrs. Wynn's home the
23	second time, did you remove the string filter before
24	placing the 75-ohm trap on, or was the 75-ohm trap in
25	addition to the string filter?

1	A I don't remember if the string filter was		
2	still even on. I do not recall, but I did not put a		
3	string filter and a 75-ohm on together.		
4	Q Okay. Can you describe for us roughly how it		
5	was that you would actually attach a string filter?		
6	What is involved in the process?		
7	A A string filter just simply is a piece of		
8	antenna wire cut to the 89.5 frequency. You just strip		
9	a little of the wire down from the at one end of it		
10	and you can sometimes put a connector on there, and		
11	you just slip it up onto the screws on the back of the		
12	TV set.		
13	Q Okay. How long was this string?		
14	A It would be cut to whatever the frequency for		
15	89.5.		
16	Q Okay. Well, can you give us an approximate		
17	length of it?		
18	A Approximately about like that.		
19	Q So maybe 18 inches long?		
20	A Something similar to that.		
21	Q Okay. So it is an 18-inch piece of		
22	unstripped or stripped wire? Is that what it is?		
23	A No, it is not stripped. It is just it is		
24	the coated wire.		
25	Q The coated wire?		

1	A Uh-huh.
2	Q Okay. And that is simply attached to the
3	back of the television?
4	A Yes.
5	Q Okay.
6	A To the TV terminals, in the back.
7	Q Okay. So there would be the regular antenna
8	feed, and then this would be sort of added on?
9	A Yes.
10	Q And what was the device that was attached to
11	Mrs. Wynn's radio?
12	A A choke filter.
13	Q And could you tell us what that is?
14	A It is just a little rectangular block there
15	that is open in the center. You wrap the electrical
16	cord of the radio as close as you can up to the radio,
17	the back of the radio, and this will block out
18	electrical interference.
19	Q Okay. In other words, are you distinguishing
20	that from blanketing interference?
21	A Well, this, what I was told by the people at
22	the Radio Shack, that the interference on the radio was
23	coming in through the electrical cord. So I would wrap
24	this and put it up next to the radio and that way to
25	block that coming in.

1	Q	All right. So this device, I mean in terms
2	of your u	understanding, was designed to act as a filter?
3	It was going to block out	
4	A	Yes.
5	Q	the effects of KOKS?
6	A	Yes.
7	Q	Now moving on to the Grays. I think before
8	we went b	eack to Mrs. Wynn, you had indicated that you
9	recalled	going to the home of the Grays?
10	A	Yes.
11	Q	And do you recall how many trips you made to
12	the Gray	household?
13	A	One.
14	Q	Now I would like you to refer to Mass Media
15	Exhibit N	o. 7.
16	A	Yes.
17	Q	If you would, please turn to page 7.
18	A	Page 7? Yes.
19	Q	And do you recall ever receiving the document
20	that appe	ars there?
21	A	Yes.
22	Q	And would that also be true with respect to
23	the docume	ent that appears on page 9?
24	A	Yes.
25	Q	Do you see what is written underneath there?

1	Admittedly, it is a bit faint.
2	A Yes, it is.
3	Q Do you recall having received this and having
4	read it?
5	A Yes. I cannot make out the whole sentence.
6	Q Understood. But your recollection is that at
7	the time that you first received this, you could read
8	it?
9	A No. We only got copies of copies,
10	so some of them were very blurred, some of them very
11	faint.
12	Q How about page 10?
13	A I don't recall if I did read this or not
14	here, to be honest.
15	Q But you do recall receiving page 9?
16	A I do recall receiving page 9.
17	Q All right. Turning to page 12, do you recall
18	receiving page 12?
19	A Yes.
20	Q Now, if you would, please turn to Mass Media
21	Exhibit No. 19, page 2.
22	A Nineteen? Yes.
23	Q It reads "Complaints Cured"?
24	A Yes.
25	Q Do you see Mrs. William T. Gray?

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1	A Yes.		
2	Q And do you know how that information came to		
3	be there?		
4	A After I made the visit to the Grays' home,		
5	the reception was restored on all channels except		
6	Channel 6. I was operating under the assumption that		
7	we did not have to restore Channel 6. This was from my		
8	contacts with the FCC people and also with our counsel.		
9	And so I turned it in as a result. That's how it came		
10	to be there.		
11	Q Okay. So you told Mr. Dunne that Mrs. Gray's		
12	complaint was resolved?		
13	A Yes.		
14	Q Now turning to Mass Media Exhibit No. 21.		
15	A Twenty-one?		
16	Q Page 12.		
17	A Okay. Yes.		
18	Q And do you see the reference there to No. 41?		
19	A Yes.		
20	Q And do you recall transmitting this		
21	information to your counsel?		
22	A I do.		
23	Q And that is what you transmitted to him?		
24	A Yes, I did.		
25	JUDGE STIRMER: Mrs. Stewart, just so I am		

1	clear. The information in Mr. Dunne's letters to the
2	Commission discussing the blanketing situation, are
3	they based upon information that you imparted to him?
4	THE WITNESS: Yes.
5	JUDGE STIRMER: In all instances?
6	THE WITNESS: Yes.
7	JUDGE STIRMER: Mr. Dunne didn't come out
8	here and do an independent investigation of this
9	matter?
10	THE WITNESS: No.
11	JUDGE STIRMER: He relied on you to give him
12	the information that appears in these letters?
13	THE WITNESS: Yes, he did.
14	JUDGE STIRMER: All right. When we come to a
15	convenient point for a mid-morning break, let me know.
16	MR. SHOOK: When we finish with Mrs. Gray,
17	that should be a good time.
18	JUDGE STIRMER: All right.
19	BY MR. SHOOK:
20	Q Now what, if anything, referring you back to
21	Mass Media Exhibit No. 7
22	A Seven? All right.
23	Q Okay. Now you have indicated to us that you
24	did receive and you looked at page 9. You don't
25	remember page 10, but you do remember page 12?

1	A	Yes.	
2	Q	Right?	
3	A	Yes.	
4	Q	Now what, if anything, did you do relative to	
5	Mrs. Gray	after looking at pages 9 and 12?	
6	A	I failed to make contact with her.	
7	Q	Now with respect to the last paragraph that	
8	appears or	n paragraph 9 of your testimony?	
9	A	Yes.	
10	Q	Is it your understanding that Mrs. Gray's	
11	radio problem was exclusively or certainly primarily		
12	the AM band?		
13	A	That is what she told me.	
14	Q	Okay. Did you have any occasion to listen to	
15	her radio	to try to verify what, you know, her	
16	complaint	was?	
17	A	Yes. When I got through installing the	
18	filter on	the TV, she said, "Come over here. I want	
19	you to lis	ten to my radio." I did.	
20	Q	And did you listen to both the AM and the FM	
21	band or ju	st the AM band?	
22	A	No, she didn't say anything about the FM.	
23	She just s	aid it was her AM band, and it had a buzzing	
24	sound on i	t. And I noted from the file of Mr. Moffit's	
25	visit that	when KOKS went off the air, her AM band	

1	still had the buzz on it.		
2	Q Okay. What is it from Mr. Moffit's files		
3	that you recall seeing? Or what are you referring to		
4	here when you talk about Mr. Moffit?		
5	A When Mr. Moffit's visit was here. It's in		
6	the exhibits here, when Mr. Moffit and Mrs. Raines was		
7	here.		
8	Q Uh-huh.		
9	A They visited the home of Mrs. Gray.		
10	Q Right.		
11	A And he said that when KOKS was asked to go		
12	off the air, the buzz was still on the AM band of the		
13	radio.		
14	Q Okay. But that reference there, are you		
15	saying that this is is this the first time that you		
16	are seeing the Moffit-Raines report?		
17	A Yes.		
18	Q Or did you see that reference earlier?		
19	A No, this is the first time that I saw the		
20	Moffit and Raines report.		
21	Q Okay. Within the last several days?		
22	A Yes, weeks.		
23	MR. SHOOK: Your Honor, this is a fine time		
24	for me.		
25	JUDGE STIRMER: All right. Let's take a		

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short recess and reconvene at about 5 after 11. 1 2 the record. That will give you about seven minutes. 3 (Whereupon, a brief recess ensued.) 4 JUDGE STIRMER: Mr. Shook, would you proceed, 5 please? 6 MR. SHOOK: Yes, Your Honor. 7 BY MR. SHOOK: Mrs. Stewart, we are now up to paragraph 10 8 0 9 of your testimony. The first sentence, where it reads 10 about your knowledge of the blanketing contour, now did 11 you derive that knowledge from the FCC letter that was 12 received in October 21 letter? 13 Α Yes. 14 Now there is a third sentence there is an 15 indication, or there is a statement, "I did not use a 16 map and could not use a map." What efforts, if any, 17 did you make to obtain a map in order to determine, you 18 know, where somebody might live? We had a county map that showed the roads. 19 Α 20 We don't have streets. We have roads that are numbered. And so we had a county map that we had, and 21 22 I would always ask them what county road they lived on. 23 Now when you were doing this, did you have 24 some marking on the map to give you an idea, you know, 25 how far out the 2.5-mile contour mile was and then you

1	would try to place an individual?
2	A We tried that, yes.
3	Q Okay. Now when did that process begin?
4	A It was probably later on up into '89 that we
5	would go with the map. You know, to place an exact
6	date, sir, I don't know.
7	Q Okay. So sometime in what? Spring or summer
8	of 1989?
9	A Possibly.
10	Q All right. And at that point you had a
11	county map?
12	A I had a county map.
13	Q And you had a circle drawn on it?
14	A Yes. We tried to do that, yes.
15	Q And then you would try to place someone's
16	residence either inside or outside of that circle
17	according to the information you got on the telephone?
18	A Yes.
19	Q Okay. And that was how you ascertained or
20	determined whether somebody was inside or outside the
21	blanketing contour?
22	A Well, we would also ask them the directions
23	and then ask them how far, so that everybody was
24	familiar with the highway patrol and their tower, and
25	we would ask them how many miles did they estimate that

1	1 they lived from the highway patrol. That w	as a good		
2	2 judging too, you know. We tried to judge to	hat by air		
3	miles, not by actual land miles. But sometimes that			
4	information was they would give us further than			
5	they would give us the land miles, which was different			
6	than the air miles.			
7	JUDGE STIRMER: Mrs. Stewart, did you ask			
8	8 your consulting engineer to point out to you	your consulting engineer to point out to you where the		
9	blanketing contour fell on a map so that you would have			
10	information from a reliable source as to what precisely			
11	11 was the blanketing contour?	was the blanketing contour?		
12	12 THE WITNESS: I don't recall, Judg	je.		
13	JUDGE STIRMER: You don't recall of	loing that?		
14	14 THE WITNESS: I don't recall it.			
15	JUDGE STIRMER: All right.			
16	BY MR. SHOOK:			
17	Q Now in the last sentence of paragr	aph 10, it		
18	18 talks about a map filed with the FCC in Sept	ember of		
19	19 1989.			
20	20 A Uh-huh.			
21	Q And I would like you to refer to M	lass Media		
22	22 Exhibit No. 22.			
23	A Twenty-two? Okay. Okay, yes.			
24	Q Now is the map that you are talking	g about?		
25	25 A This the map that Kevin yes, Mr	. Fisher.		

1	That's right. This is the map that Mr. Fisher did fix	
2	up for us.	
3	Q Okay. So it is October of 1989 then? Right?	
4	A October of '89. Right.	
5	Q Now during this year period, what, if any,	
6	conversations did you have with Mr. Fisher to determine	
7	what his experience with blanketing interference was?	
8	A I don't recall talking to Mr. Fisher.	
9	Q Your consulting engineer now. Right?	
10	A Yes, right. Right.	
11	Q Okay.	
12	A We were trying to work it through the local	
13	engineer, first with Mr. Abernathy. And then when	
14	Mr. Lampe came on, I would always consult with Mr.	
15	Lampe.	
16	Q Okay. So in terms of what to do about	
17	blanketing, your principal engineering consultants were	
18	either Mr. Abernathy initially and then Mr. Lampe later	
19	on?	
20	A And also the FCC officials that I talked to.	
21	Q Right. And Mr. Fisher didn't play much of a	
22	role here?	
23	A Not other than preparing this map for us.	
24	Q Okay. I guess then other than talking with	
25	you about string filters?	

1	A	Yes.
2	Q	He was the one that
3	A	He was the one that came up with the string
4	filter, y	es.
5	Q	Okay. But he didn't talk to you about any
6	other fil	ters?
7	A	Not that I recall.
8	Q	All right. When Mr. Abernathy first
9	designed,	or is it correct in saying that he designed
10	the strin	g filter or he simply cut them according to
11	the speci	fications?
12	A	He cut them according to the specifications.
13	He had a	meter that he ran that would give him the
14	specifica	tions that he had to get the length that was
15	required.	
16	Q	Now from your understanding, had Mr.
17	Abernathy	ever used string filters before?
18	A	I don't recall him saying.
19	Q	Now do you recall whether he indicated that
20	they had	been a success or not?
21	A	I do not recall, sir.
22	Q	Now how much did it cost to prepare a string
23	filter?	
24	A	A minimal amount. It is just a piece of 300
25	wire, and	then we put a little connector on the end of

1	it where it would be easy to connect to the terminals
2	on the back of the TV.
3	Q Well, is the process then that you bought a
4	lot of wire and then it was just cut?
5	A Yes.
6	Q So in other words, the cost, the cost at
7	least of the equipment per filter, was what? Less than
8	a dollar?
9	A I really don't know. Basically probably a
10	dollar or two dollars, whatever.
11	Q Now with respect to the is the FM notch
12	filter the same thing as the 75-ohm filter? Or are
13	they two different filters?
14	A The 89.5 is the FM notch filter they are
15	talking about. They are specifically made for 89.5.
16	Q Okay. And that is different from the 75
17	A The 0-75, yes.
18	Q The 75-ohm?
19	A Yes, sir.
20	Q All right. The 75-ohm filter was something
21	that you went out to buy?
22	A It is an archer, yes. It was bought at Radio
23	Shack.
24	Q Radio Shack?
25	A Yes.

1	Q	That was what? About four dollars per
2	filter?	
3	A	Yes, approximately that.
4	Q	How about the FM-notch filter? How did you
5	go about	obtaining those?
6	A	Through Mr. Lampe. Mr. Lampe found the
7	company t	hat made them.
8	Q	And you bought them?
9	A	Yes, from Microwave Filter Company.
10	Q	Do you recall approximately how much per
11	filter?	
12	A	No, I don't.
13	Q	Now when you were first involved in
14	installin	g string filters, were you the only person who
15	did that?	
16	A	Yes.
17	Q	And you went by yourself? Correct?
18	A	Yes.
19	Q	And how was it that you learned, you know,
20	how to in	stall the string filter?
21	A	Very simple. Mr. Abernathy showed me.
22	Q	And is that also true with respect to the
23	notch fil	ter?
24	A	Are you talking about the notch or the 75?
25	Q	Well, why don't we start with the 75? I

1	missed that.
2	A Okay. The O-75, it is a little bit
3	differently. If the people had a co-axial cable, all
4	you did is just put it on the back of the TV. And you
5	had to have a connector, a little, short connector, and
6	you would hook that in, coming in from the outside.
7	I'm sorry. You would put the little connector on the
8	TV, hook it to the notch filter and then put the I
9	mean, not the notch filter, the 0-75 and hook the
10	lead-in wire onto the other end.
11	Q All right. And how about the notch filter?
12	A The notch filters, I never did install but
13	one, and that was at Mrs. Wynn's, when I went to Mrs.
14	Wynn's house later. That was the only one I ever
15	installed. They were very simple to install. You can
16	install them right at the back of your TV and hook your
17	if it is co-axial cable, you can hook it right onto
18	there.
19	Q Was the string filter
20	A Now if you had
21	Q The string filter was used for TV only?
22	Correct?
23	A Yes.
24	Q And then you had previously described a

25 little filter or device that you would use for radios?

1	A Yes. Yes, called a notch filter. I me	an,
2	not a notch filter, a block filter.	
3	Q The block filter? Now did there come a	time
4	when you spoke with Mr. Lampe about his working f	or
5	KOKS?	
6	A Yes.	
7	Q And approximately when did that take pl	ace?
8	A Are you talking about as a contract eng	ineer?
9	Q Yes, ma'am.	
10	A No, that was through him and Mr. Stewar	t.
11	Q Okay. So you had nothing to do with hi	m
12	first coming to work	
13	A No, just	
14	Q for KOKS?	
15	A No.	
16	Q Okay. And so you weren't involved in t	he
17	negotiations?	
18	A No.	
19	Q And you weren't involved in instructing	him
20	what Mr. Lampe's duties were?	
21	A There was no instruction. Mr. Lampe ju	st
22	said that he had what he had to have, wrote up	the
23	contract, and it was signed.	
24	Q Do you recall whether blanketing was	
25	discussed with Mr. Lampe?	

T	A Other than just what Mr. Lampe put in his
2	contract.
3	Q Do you know why it was that Mr. Lampe was
4	decided upon as the contract engineer?
5	A He was the contract engineer he was the
6	engineer for KJEZ and also did some work for other
7	radio stations. And we was looking for a local
8	engineer, and we thought that since he was an engineer
9	for another radio station that he would be the most
10	likely person to get.
11	Q Now essentially he was to be the replacement
12	for Mr. Abernathy?
13	A Yes, sir.
14	Q Now do you recall, all told, approximately
15	how many string filters you installed?
16	A No, I do not.
17	Q Now moving to page 10 of your testimony,
18	beginning with the fourth line down, where it mentions,
19	"The string filters that we installed generally
20	improved reception on Channel 8, but did very little to
21	cure the problem with 6. Did the string filters have
22	any effect on reception of Channels 12 and 15?
23	A I did not notice anything on 12, and most of
24	the areas, the houses that I went to had the ghosting
25	on 15. We always did, and most of the houses that I

1	went to had the ghosting, and the string filters had no
2	effect on the ghosting.
3	Q Okay. And what about Channel 12?
4	A I really didn't the homes that I went to,
5	I didn't see the interference on Channel 12, the
6	blanketing interference.
7	Q Okay. You saw something on Channel 12, but
8	as far as you understood, what you saw was not
9	blanketing?
10	A I don't recall seeing anything on Channel 12
11	other than maybe snow.
12	Q Okay. Were you ever in a house watching
13	Channel 12 when KOKS went off the air?
14	A No.
15	Q Were you ever in a house watching Channel 15
16	when KOKS went off the air?
17	A No.
18	Q Now moving on to paragraph 13, there is a
19	mention here of the Ellises. It is about two-thirds of
20	the way down in the paragraph.
21	A Yes.
22	Q Now did you become aware that Mr. Lampe knows
23	the Ellises very well?
24	A No, not until much, much later.
25	Q As in 1991?

1991. 1 Α Did there come a time in 1989 that you 2 Q 3 discovered that Mr. Lampe had gone to households of 4 various complainants in order to work on the individuals' television sets for the purpose of trying 5 to improve reception? 6 7 Α No, we were not aware of it. 8 0 Did there ever come a time when you became 9 aware that Mr. Lampe had in fact gone to persons' households and worked on their television sets for the 10 11 purpose of improving reception? I think Mrs. Piper's. Some information came 12 Α 13 back through the FCC that he had worked on hers, and 14 outside of that I really don't recall. Or after that, 15 the Ellises, I believe. I think maybe in a letter Mr. 16 Lampe might have referred that he had worked on Mrs. 17 Piper's TV set. I don't exactly know when that letter 18 was. 19 Q Okay. 20 MR. SHOOK: Your Honor, I am going to place 21 before the witness what has been marked for 22 identification at this point. It is not in evidence, 23 but it is marked for identification as Mass Media 24 Exhibit No. 29, pages 5 and 6 and 7 and 8. 25 JUDGE STIRMER: Very well.

1	BY MR. SHOOK:	
2	Q Now in mentioning Mrs. Piper, and I am	
3	showing you the documents, pages 5 through 8 of what	
4	has been marked for identification as Mass Media No.	
5	29. Are these the documents that you were referring to	
6	that you had seen?	
7	A Yes.	
8	Q And these came to you in the fashion that you	
9	had previously described, that the individual would	
10	send it to the FCC and then you would get this back	
11	from the FCC?	
12	A Mrs. Smith and Mrs. Hillis would send them to	
13	the FCC and then the FCC would send them back to us.	
14	Q All right. And do you recall reading	
15	A Yes.	
16	Q the documents that you have there, pages 5	
17	through 8?	
18	A Yes.	
19	Q What, if anything, do you recall doing after	
20	having read through those pages?	
21	A I don't recall doing anything.	
22	Q Do you recall contacting Mrs. Piper for the	
23	purpose of arranging any payment of money to her?	
24	A No.	
25	Q Now I would like you to refer to Mass Media	
ľ		

Exhibit 21, page 16. Do you see No. 65?
A Yes, sir.
Q This information was given by you to
Mr. Dunne?
A Yes.
Q Do you have any recollection as to whether
the two dates that are noted there have any relation to
the two visits that were made to Mrs. Piper's home?
A Probably did.
Q And now I have handed you back pages 5 and 6
of Mass Media Exhibit 29.
A Yes.
Q Can you give me a time sequence in terms of
when you told Mr. Dunne about your visits to Mrs. Piper
in relation to when you saw the two pages that you are
holding there from Mrs. Piper?
A This was the information was given to
Mr. Dunne in January of '89.
Q Well, now this letter, Mass Media Exhibit 21,
if you look at page 1 of Mass Media Exhibit 21, it
bears the date of September 22, 1989. You have to go
to page 1 of the letter to see that.
A Okay. At the top, okay.
Q Okay. Now do you recall what timing was
involved or what triggered the preparation of Mass

1	Media Exh	ibit 21?
2	A	This one right here you are talking about?
3	Q	Yes, ma'am.
4	A	I don't know. I don't recall.
5	Q	Okay. Mrs. Stewart, I would direct your
6	attention	to Mass Media Bureau Exhibit No. 20.
7	A	Twenty?
8	Q	It is the first notebook.
9	A	Oh, I'm sorry.
10	Q	The last one in the first notebook.
11	A	All right.
12	Q	Do you ever recall seeing this letter?
13	A	Yes.
14	Q	Can you just take a brief look through it?
15	A	Okay.
16		(Pause.)
17	A	Yes.
18	Q	Do you recall approximately when you saw Mass
19	Media Exhi	bit No. 20?
20	A	Probably in April, sometime in April.
21	Q	Okay.
22	A	Because it was dated March 29. By the time
23	we got it,	it would have been the first part of April.
24	Q	All right. Now do you see the address that
25	is noted a	t the top?